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ABSTRACT

Under the Elementary and Secondary Education Act (ESEA) Title I, providing grants to state and local school districts to benefit educationally deprived children in low-income areas, the Educational Amendments of 1978 comparability provision is assessed in determining equality of funded services with non-titled school districts and to identify possible provision alternatives. The extent of administrative burden created by comparability; conflict with other educational programs; and the distribution of resources under the existing provision are analyzed and major findings are given. Implementing processes, enrollment size and staff or other resources are examined. Among the study limitations are the narrow focus on the provision alternatives, the effect of a burden or negative impact model, and the factors of size and structure in the study sample. Data qualities and the study's timing with changes in resource allocations, as well as misunderstandings by the districts of existing and alternative provisions, are further limitations. Seven charts detail the study mandate and comparability provision changes, criteria, implementation, and impact as discussed in the text. (CM)

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ED214953

Executive Summary

Utilization and Effects of Alternative Measures of Comparability

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EXECUTIVE SUMMARY

On April 11, 1965, Congress enacted the Elementary and Secondary Education Act (ESEA). Title I of ESEA is a categorical program intended to provide specific types of children (educationally deprived children in greatest need of assistance) in specific areas (areas having high concentrations of children from low-income families) with special services above and beyond those normally provided as part of the district's regular educational program. In short, Title I funds constitute a grant to state and local educational agencies for the benefit of educationally deprived children residing in low-income areas.

The Title I statute and implementing regulations contain several provisions designed to ensure that Title I funds are used to pay for special or supplementary services. The comparability provision, which is the topic of this study, requires that "services taken as a whole" that are provided with state and local funds to Title I project area schools must be "approximately equal" to the state and locally funded services provided to non-Title I area schools. The actual measurement of comparability, therefore, requires defining "services taken as a whole" and "approximately equal" thereby establishing standards for comparing project and nonproject schools. The definition of "services taken as a whole" and the procedures for demonstrating comparability have gone through significant changes since the Title I legislation was enacted. Figure 1 provides an overview of these changes from 1965 to 1980. The comparability provision contained in the Education Amendments of 1978 was the subject of this study. Figure 2 details the requirements under each component of that provision.

The Education Amendments of 1978 directed the Commissioner of Education to conduct a study of the feasibility and desirability of one or more alternative comparability provisions for Title I of ESEA because during the 1978 reauthorization hearings, many members of Congress were concerned by testimony that the comparability provision was overly burdensome and prevented districts from adopting innovative staffing or service delivery systems that would improve and expand services to all district children. The U.S. Office of Education contracted with AUI Policy Research to conduct a study to assess the impact of the existing comparability provision and to identify alternatives which could reduce administrative burden and increase flexibility, without

compromising the underlying purpose of the comparability provision. (See Figure 3 for the text of the study mandate.)

The study was designed to provide answers to five questions:

- What are the comparative administrative, reporting, monitoring, auditing, and enforcement burdens created by the existing comparability provision and alternatives?
- To what extent do the comparability provision and alternatives conflict with local, state and other federal education programs and policies?
- To what extent do the comparability provision and alternatives ensure that districts provide Title I and non-Title I schools with approximately equal quantity and quality of instructional services (using state and local funds)?
- To what extent are the three outcome variables (i.e., burden, conflict, and distribution of resources) influenced by state and district processes used to implement comparability under the existing provision and alternatives?
- To what extent are the three outcome variables influenced by contextual factors (such as enrollment size, staff, or other resources used to prepare the district's comparability report) under the existing provision and alternatives?

Much of the information used to answer these questions and prepare this report was obtained during on-site interviews and through quantitative data collected from 44 school districts in the fall of 1980. Ten of these districts were implementing the existing comparability provision. Thirty-four had elected to participate in an experiment that granted them a waiver of the existing provision in exchange for implementation of an alternative.

Of the 34 waiver districts, 24 implemented an alternative as originally proposed or with minor changes and reported under the alternative to their SEA. Three

districts implemented their alternative but chose to report to their SEA under the existing provision. Seven districts did not implement their alternative and chose to comply with the existing comparability provision. Figure 4 presents the alternatives as proposed by the participating districts and their implementation status.

This study found little evidence that the comparability provision resulted in excessive administrative burden or reallocation of resources in conflict with state or local allocation policies. This is supported by results of a telephone survey to 500 districts conducted early in the study to determine interest in study participation. Few of the districts surveyed reported that problems with the comparability provison existed. Of the 405 districts for which these data are available, 27 reported administrative burden, 94 reported conflict with state or local allocation policies, and only 18 reported that comparability was both burdensome and conflicted with state or local policies.

Some of the alternative comparability provisions did reduce or eliminate administrative burden and/or the need for reallocation of resources in some districts. However, only a small number of districts are likely to benefit from adoption of the alternatives. Many districts might experience greater burden or conflict if such alternatives were uniformly required. The study conclusions resulting from an assessment of the existing and alternative provisions suggest that:

- Increasing SEA flexibility in the administration of comparability could enable specific problems experienced by districts to be resolved on a case-by-case basis. Such problems include:

  - conflicts between a state or local policy or federal or state court order which mandates equitable criteria for equalizing resources among district schools and the criteria used to measure comparability;

  - reallocations of resources caused by unique types of special programs which cannot be excluded from the comparability calculations; and

  - reallocations of resources due to extenuating circumstances which prevent or

inhibit a district from achieving comparability in all district schools (e.g., severe declining enrollment).

If SEAs were granted increased discretionary powers, then the U.S. Department of Education would need to develop guidelines to ensure that districts would be treated fairly and consistently. The analyses also indicated that precise definition of the SEA role in administering comparability could increase the likelihood that the intent of comparability is being met by school districts.

- Selection of an early October date for collection of comparability data (i.e., date certain) could minimize disruption to schools and classrooms because reallocations of resources could be made early in the school term. Further, administrative burden could be reduced in large districts with fluctuating enrollment if the collection of new data for all schools was not required when preparing a revised comparability report.

- If the maintenance of comparability is desirable, disruptions to schools and classrooms due to the continual reallocation of resources could be minimized by requiring districts to submit an annual maintenance of comparability report, using a 10 percent permissible variance.

These findings must be interpreted with caution, because the study and analyses have several important limitations.

One limitation is the narrow focus of the study as mandated by Congress. The statute limited the nature and scope of the alternatives included in the waiver experiment. Only alternatives very similar to the existing provision could be implemented. These included changes to the criteria used to measure comparability, to the comparison process such as the rules for grouping schools, and to the statistics used as measure of the aggregate resources provided to non-Title I schools. The legislation did not allow districts to implement changes to the comparability process they believed most likely to resolve problems in their districts. These included:

(1) an increase in the variance permitted between Title I and non-Title I schools; (2) changes in the reporting requirements and in the sanctions applied when one or more schools are noncomparable; and (3) changes to the maintenance of comparability requirement. While the probable impact of these changes is described in this report, the analysis of the impact is not based on empirical results of implementation in the case study sites.

Another limitation is that the study is based upon a burden or negative impact model of federal, SEA, and school district relations. The study was designed to provide Congress with information on the extent to which comparability conflicted with state and local resource allocation policies and/or was burdensome. As a result, the case study districts overrepresent the populations of such districts. Districts were also asked to identify burdens and conflicts. More neutrally phrased questions may have elicited fewer complaints about comparability.

The use of a burden model allowed us to collect the information requested by Congress and did not severely affect the outcome of this study. Even with the burden model we did not find evidence that comparability poses an excessive burden for most of the districts in the study or conflicts with state and local resource allocation policy. While 95 percent of the districts reported that at least one aspect of comparability was burdensome, over half spent less than 10 days on comparability. Only 16 percent of the districts spent more than 60 days on comparability. Similarly, 75 percent of the districts reported conflicts with state and local resource allocation policies, but only one district provided evidence that comparability actually prevented the district from carrying out their local policy for allocating resources to schools. Further, only 24 percent of them hired or transferred more than three staff members to achieve comparability during the 1980-81 school year.

A third limitation is the size and structure of the case study sample. The statute mandating this study limited the sample to all districts in one state and 20 additional districts selected from other states which were geographically representative of the nation. In order to assess the impact of SEA administration of comparability, the 20 sites were clustered in 11 other states. One result of this mandated sampling plan is that one of the alternative provisions is overrepresented because the only SEA willing to serve as an overrepresented state designed one alternative used by all of its participating districts.

A fourth limitation was data quality. The analyses regarding comparability of resources were performed on data provided by only 14 school districts which were geographically distributed and had a wide variety of demographic characteristics. Much of the data requested was not provided by many of these school districts and some of the information provided was not, strictly speaking, comparable across school districts (e.g., because of different school district policies or the different ways financial data are collected and categorized). Such problems were taken into account and corrected as much as possible when performing analyses on individual school districts. Some school districts were excluded from certain analyses because of the lack of reliable data. Due to these data problems and the very small sample, comparisons across school districts and generalizations to school districts outside the sample should be done with caution.

A fifth limitation was the timing of the study. Participating districts were notified they had a 1-year waiver in August 1980. None of the participating districts, therefore, changed their resource allocation procedures -- in part because of fear that such changes would cause conflicts with the comparability provision in future years. They assigned staff to schools following usual district practice, prepared comparability reports under the existing and alternative comparability provision, and reported to the SEA under the provision that resulted in the least adjustments to staff assignments.

A sixth limitation is that many of the staff of the participating SEAs and districts did not fully understand the waiver rules. (See Figure 5 for a list of district obligations under the waiver.) Some districts achieved comparability under the existing provision, and then prepared a second report under the alternative. Often, such districts were in compliance with both the existing and alternative provisions. Thus, assessment of the impact of the existing and alternative provisions were confounded. Seven districts simply lost interest or did not fully understand their obligations under the waiver application. As a result, they took no action to implement the waiver. Therefore, there is no information on the impact of their proposed alternative. Three other districts tried their alternative but reported to the SEA under the existing provision. Eight districts did not implement the waiver as described in the waiver application. The high percentage of districts that did

not implement their alternatives severely restricted the narrow range of alternatives assessed empirically in this study.

In addition to these limitations, the reader should take note that in the summer of 1981, Congress substantially changed the comparability provision. Districts will now be required to file a written assurance with their SEAs that they have established: a district-wide salary schedule; a policy to ensure equivalence among schools in teachers, administrators and auxiliary personnel; and a policy to ensure equivalence among schools in the provision of curriculum materials and instructional supplies. Nonetheless, examination of the comparability provision as it existed since 1978, as well as variations of that provision, offers an opportunity to inform later debates about the merit of the new requirements.

The following section summarizes the study findings -- the impact of the components of the existing and alternative provisions on each of the areas of administrative burden, conflict with state and local allocation policies and the distribution of resources between Title I and non-Title I schools. The final section synthesizes the impact of the existing and alternative provision on all three areas concurrently.

Major Findings

A first step in assessing the impact of the existing comparability provision and alternatives was to determine those areas of the existing provision which lead to administrative burden and cause conflict with state and local allocation policies. Alternative provisions were then compared to the existing provision to examine how changes would impact on those two areas. An empirical analysis of alternatives was also conducted to determine how changes to the existing provision would affect the distribution of resources among Title I and non-Title I schools.

Administrative Burden

In this study, the measure of administrative burden was developed in a three-step process. First, districts were asked to describe the tasks needed to comply with the

comparability provision. Second, they were asked to identify the most burdensome tasks. Finally, they were asked to estimate the amount of staff time required to complete the tasks identified as most burdensome. From the district responses, administrative burden was estimated for each district as the time spent by the district on the two most burdensome comparability tasks. The specific tasks identified as most burdensome varied from district to district.

Ninety-five percent of the 44 districts included in the study identified one or more comparability-related tasks as being burdensome. However, over half of the districts reported that comparability required less than 10 days of staff time per school year, concentrated within a 2-month period. An additional 23 percent of the school districts reported spending 10 to 30 days on comparability also within a 2-month period. The remaining districts reported efforts ranging from 62 to 612 days throughout the school year. In the latter cases, this effort was due to characteristics of the school district and/or to the SEA administration of comparability such as a requirement to prorate students and their corresponding staff back to the home attendance area school if a student attends an out-of-attendance area school -- not to the components of the comparability provision. Thus, findings did not show that the comparability provision requires excessive amounts of staff time, nor did the study find that most alternatives would significantly impact on the level of effort required of school districts.

Under the comparability provision, most of the burden reported by school districts is associated with data collection activities, because data are often unavailable in the format required for comparability. Most districts did not report that preparation of the comparability report was burdensome once data were collected. For districts with enrollment over 25,000, fluctuating enrollment, or a desegregation plan, the two aspects of the comparability provision found to be burdensome were preparation of a revised comparability report and maintenance of comparability requiring new data collection. Additionally, SEA enforcement of the comparability provision and SEA adminstrative practices have an important impact on administrative burden -- where SEAs do not fully enforce the provision, burden is not increased. Conversely, where SEAs fully enforce or add to the existing provision, burden is increased in some instances.

Alternative comparability provisions were shown to have little uniform impact on adminstrative burden. Changes to the criteria would eliminate tasks many districts consider to be burdensome to the extent that inaccessible data need not be collected. Some criteria changes (e.g., expenditures for instructional services per pupil) would increase burden for the vast majority of districts that do not now collect such data.

Changes to the reporting requirements for preparation of revised reports and maintenance of comparability could significantly reduce burden in districts with high staff and pupil turnover, but have little impact on other districts. Similarly, changes to SEA adminstrative practices would reduce burden in some districts, but increase burden in others.

Conflict with State and Local Resource Allocation Policies

For this study, conflict was measured by district staff responses to questions concerning the extent to which a component of the comparability provision prevented the district from carrying out their state or local resource allocation policies, resulted in resource reallocations after the school year began, or prevented the district from providing needed services or programs. To distinguish between perceived and actual conflict, respondents were asked to provide specific examples of policies violated or resources reallocated because of comparability.

Three-fourths of the 44 districts perceived that comparability conflicted with state or local resource allocation policies. Only one of these districts, however, provided a concrete example of how comparability actually prevented them from carrying out local policies for allocating staff to schools. The remaining districts reported that they did carry out their local policies for allocating staff, programs and services. The conflict they described was the result of staff reallocations made to comply with comparability after the school year began. With eight exceptions, these staff reallocations were relatively small (less than three). However, even small changes in staff assignments were perceived as disruptive if they took place late in the school year.

Most implemented alternatives were designed to reduce administrative burden and had little impact on conflict. Those that were successful in reducing the magnitude of

resource reallocation were those that were designed to match district-specific resource allocation policies.

Distribution of Resources

This study included an empirical assessment of the distribution of state and locally provided resources between Title I and non-Title I elementary schools and examined the extent to which districts would have to reallocate resources if specific alternatives were adopted. Where findings suggest that districts could achieve comparability with fewer staff reassignments under a specific alternative, they also imply that the alternative would allow large differences in the distribution of resources between Title I and non-Title I schools. Where analysis results showed increased difficulty in the ability of districts to achieve comparability, the implication is that resources would be more evenly distributed between Title I and non-Title I schools than under the existing provision.

The empirical analysis indicated that changing the definition of staff in the pupils per staff or staff salaries per pupil resource measures has no uniform effect across districts on their ability to achieve comparability. However, the inclusion of longevity pay in the salaries per pupil measure does have an effect. There is often an increase in difficulty in achieving comparability when longevity is included. This indicates that non-Title I schools are often provided with more experienced staff.

Several comparison standards and levels of permissible variance were also examined. The comparison method that created the most difficulty for districts in achieving comparability was to compare each Title I school with the best-staffed or highest-funded non-Title I school. The easiest comparison method found was to compare the Title I average to the non-Title I average. Demonstrating comparability by comparing each Title I school to the district-wide average was found to be easier than with the existing method for districts whose Title I average was below the non-Title I average but harder for districts whose Title I average was above the non-Title I average.

Synthesis of Findings

So far, the findings have been presented solely in terms of the impact of existing and alternative provisions on each of the areas of adminstrative burden, conflict with state and local allocation policies and the distribution of resources between Title I and non-Title I schools. This section considers the impact on all areas simultaneously, for each of the five components of the existing provision. SEA administrative practices are also considered. An overview of the impact of the existing and alternative provisions is provided in Figures 6 and 7, respectively.

Criteria

The existing criteria used to measure comparability, either alone or in combination, are not overly burdensome, nor do they cause substantial conflict with resource allocation polices for most districts. Severe conflict can occur where the criteria included in local policies for equalizing resources among schools are very different from the resources included in the existing criteria.

Thus, changes to the criteria do not have a significant beneficial impact for most districts. While adminstrative burden can be reduced by eliminating the need to collect salary less longevity data, the absolute reduction in the level of effort is small (the median level of effort for that task was eight days). Further, the alternative criteria found to be successful in reducing conflict, were those that were designed to match district-specific resource allocation policies. Empirical analysis of alternative criteria showed no uniform effect across districts on the distribution of resources.

Options for Including or Excluding Resources for Special Programs

The impact of the existing options for including or excluding resources for special programs is not uniform across districts. While some districts reported the collection of such data to be burdensome, other districts reported a need to exclude additional programs; where resource reallocation was reported, it was typically very small. The evidence does not suggest that the options

need to be restricted or expanded. Neither of these changes would reduce the administrative burden in districts where data is not readily accessible. In addition, the existing options did not result in substantial reallocation of resources. Although 34 percent of the case study sites claimed conflict in this area, no examples of resource reallocation were provided.

Comparison Process

The components of the comparison process -- groupings by grade span and enrollment size, the comparison between Title I and non-Title I schools and the permissible variance allowed in the distribution of resources among Title I and non-Title I schools -- have no impact on administrative burden, but can affect resource allocation in large districts with special circumstances such as a desegregation plan, or declining or fluctuating enrollment.

Having additional grade span groupings can reduce the magnitude of resource reallocations required to achieve comparability in districts with non-traditional grade spans due to a desegregation plan and/or a state or local allocation policy which places additional resources in some grades within a grade span category. A similar impact could occur by increasing the number of allowable enrollment size categories for districts with a wide variance of school sizes.

Alternative comparison standards and permissible variance levels had no impact on administrative burden; the distribution of resources was variably impacted. The empirical assessment showed that comparing the Title I average to the non-Title I average was not sensitive to distributional differences, even using a 0 percent permissible variance. Conversely, the comparison of each Title I school to the highest ranking non-Title I school, could substantially increase the need for resource reallocations, even using a 10 percent permissible variance. The use of a 10 percent permissible variance level, however, could allow large differences in the distribution of resources, regardless of the comparison method used. On the other hand, a 0 percent permissible variance forces a more even distribution of resources, regardless of the comparison selected. The empirical assessment also showed that under the existing provision, there is a tendency for the difficulty in achieving comparability to increase sharply between the 5 percent

and 0 percent levels. This suggests that some districts provide many of their Title I schools with resources just above the 5 percent standard.

Reporting Requirements and Sanctions

This component also encompasses three areas -- designation of the date certain, collection of new data for a revised report and sanctions applied to districts not achieving comparability.

When SEAs select a date certain that occurs before accurate staff and salary data are available many districts report burden; this had little impact on the magnitude of resource reallocation. However, many districts perceived that any amount of reallocation of resources could be severely disruptive to schools and classrooms if they did not occur early in the school year.

Changes to the date certain suggested by many of the study sites included a mid-summer date, an early October date and a date in December or later. In all cases, the simultaneous consideration of the impact on administrative burden and resource reallocation results in incompatability. For example, where a reduction in burden occurs using a date of December or later, there may be a neutral impact on the magnitude of resource reallocation, but disruptions due to reallocation would be increased because adjustments would come late in the year. Conversely, where reallocation would be the least disruptive using an early October date, (because districts would be able to make staff reallocations for comparability concurrently with adjustments made to compensate for actual vs. projected enrollment) burden would be increased due to the unavailability of data.

Since administrative burden is primarily associated with data collection activities, it is likely that some burden would be perceived by districts, regardless of the date certain selected. As the early October date has the only positive impact insofar as minimizing disruption, this would seem to be the appropriate choice.

Collection of new data for a revised report can be burdensome for large and mid-size districts, especially where enrollment and/or staff are fluctuating and in which data must be collected manually. Districts reported that the requirement had no impact on the magnitude of resource reallocation.

One way to reduce burden associated with new data collection while at the same time ensuring that all Title I schools in districts with fluctuating enrollment receive their fare share of services would be to allow districts to not collect new data if they meet a more rigorous standard of comparison. For example, districts could be required to demonstrate that all Title I schools are equal to or higher than non-Title I schools on the criteria used to measure comparability.

The sanctions applied to districts not achieving comparability have no direct impact on administrative burden nor do they affect the magnitude of resource reallocation. However, expansion of the existing sanctions could eliminate the need for resource reallocations in specific circumstances, while not disrupting the entire Title I program in a district due to the suspension of funding.

Because SEAs enforce sanctions, they would also need increased flexibility in applying sanctions to districts in specific circumstances. However, as the study found that SEA administrative practices were not uniform, precise guidelines would be required from the Department of Education to ensure that discretion would be fairly and consistently applied.

Maintenance of Comparability

The maintenance of comparability requirement can be both burdensome and disruptive, especially in districts with high staff and student turnover. Two districts reporting burden of over 60 days attributed this high level of effort to the maintenance of comparability requirement. Many districts did not report burden in this area because they took little or no action to ensure that comparability was being maintained. Many of the districts that did take action also reported severe disruption due to reallocations of resources late in the school year.

Only one of the SEAs included in the study required the submission of formal maintenance of comparability reports; only four SEAs required a written plan or description of procedures for maintaining comparability. The remainder required districts to submit a statement of assurance that comparability would be maintained throughout the school year. If all SEAs were consistently enforcing the maintenance of comparability requirement, the findings would have undoubtedly showed greater district burden and disruption.

If the maintenance of comparability is desirable, disruptions to schools and classrooms due to the continual reallocation of resources could be minimized by requiring districts to submit an annual maintenance of comparability report, using a 10 percent permissible variance. This would also ensure a fairly equitable distribution of resources, but would increase administrative burden in districts not now taking action to ensure that comparability is being maintained. (Note that a 10 percent permissible variance would be used only to demonstrate the maintenance of comparability; a 5 percent variance would still be required for the initial demonstration of comparability.)

SEA Administrative Practices

Under the comparability provision SEAs must disseminate information and provide technical assistance on comparability as well as monitor and audit district comparability reports and procedures. Practices need not be uniform. Actual SEA practices vary widely, and the impact is clear -- both administrative burden and the need to reallocate resources is reduced where SEAs do not fully enforce comparability. Where SEAs do fully enforce comparability, the converse is true. In addition, lax enforcement practices are often insufficient to detect errors in comparability calculations which may mask noncomparable schools. Such practices clearly do not ensure that the intent of the provision is being met.

Precisely defining the role of the SEA in administering comparability would increase both SEA and district administrative burden and the need for resource reallocation, especially where SEAs are not fully enforcing the provision. At the same time, this could result in lessened administrative burden and resource reallocation in other areas (e.g., data collection) by clearly defining all district obligations and responsibilities. Further, this would allow increased discretionary powers to be granted to the SEA from which many districts would benefit. In combination, increased SEA authority and consistent enforcement of the comparability provision, while increasing administrative burden, could be beneficial to all school districts while ensuring that the intent of the provision is being met.

Thus, study findings offer no support for drastic changes to the comparability provision. Study findings did suggest, however, that SEAs be given greater flexibility to adapt the comparability provision to the special circumstances of their districts.

FIGURE 1

CHANGES TO THE COMPONENTS OF THE COMPARABILITY PROVISION, 1965 to 1980

Components of the Comparability Provision	Regulations and Guidelines Issued Prior to 1970	Program Guide No. 57 (February 26, 1970)	First Set of Comparability Regulations (October 14, 1971)	Second Set of Comparability Regulations (June 28, 1973)	Third Set of Comparability Regulations (September 28, 1976)
I. CONTENT					
A. Criteria					
1. Unit of Analysis	Children in project areas and schools serving project areas	Schools serving project areas	Schools serving project areas	Schools serving project areas	Schools serving project areas
2. Number of Criteria	One	Four	Five	Three	Two and a statement that the district will provide other instructional expenditures on a comparable basis
3. Concepts of Comparability	Instructional and auxiliary services	1. Pupil to teacher ratio	1. Certified classroom teachers per pupil	1. Instructional staff per pupil	1. Instructional staff per pupil
		2. Pupil to non-teaching professional staff ratio	2. Other certified instructional staff per pupil	2. Instructional salaries per pupil	2. Instructional salaries per pupil
		3. Pupil to instructional non-professional staff ratio	3. Non-certified instructional staff per per pupil	3. Other instructional costs per pupil	

Continued--

Figure 1 (continued)

Components of the Comparability Provision	Regulations and Guidelines Issued Prior to 1970	Program Guide No. 57 (February 26, 1970)	First Set of Comparability Regulations (October 14, 1971)	Second Set of Comparability Regulations (June 28, 1973)	Third Set of Comparability Regulations (September 28, 1976)
		4. Instructional salaries per pupil (average or total) or average per pupil expenditure (i.e., current pupil instructional expenditures). In addition, the district had to certify that Title I funded services do not simply match services already being provided in non-project area schools	4. Instructional salaries per pupil		
			5. Other instructional costs per pupil		
B. Computation of Criteria					
1. Specification of Terms	1. Instructional staff not defined	1. Instructional staff defined into three categories	1. Instructional staff defined	1. Instructional staff defined	1. Instructional staff defined
	2. Instructional salaries not defined	2. Instructional salaries for persons described above	2. Instructional salaries defined	2. Instructional salaries defined	2. Instructional salaries defined
	3. Pupil not defined	3. Pupil not defined	3. Pupil not defined	3. Pupil not defined	3. Pupil defined (enrolled children FTE or weighted)
		4. Instructional expenditures defined as current pupil instructional expenditure			
2. Measurement	Not specified	1. Actual, not estimated data	1. Actual, not estimated data	1. Actual, not estimated data	1. Actual, not estimated data

Continued--

Figure 1 (continued)

Components of the Comparability Provision	Regulations and Guidelines Issued Prior to 1970	Program Guide No. 57 (February 26, 1970)	First Set of Comparability Regulations (October 14, 1971)	Second Set of Comparability Regulations (June 28, 1973)	Third Set of Comparability Regulations (September 28, 1976)
		2. Specify rules for allocating personnel and salaries serving more than one school	2. No rules for allocating personnel and salaries	2. Specify rules for allocating personnel and salaries	2. Specify rules for allocating personnel and salaries
		3. Longevity included	3. Longevity excluded	3. Longevity excluded	3. Longevity excluded
		4. State and local compensatory education funds included	4. State and local compensatory education funds included	4. State and local compensatory education funds included	4. Optional exclusion of state and local compensatory education funds
3. Calibration	Not specified	All staff within particular category equally weighted	All staff within particular category equally weighted	All staff equally weighted	All staff equally weighted
4. Groupings	Not specified	1. Schools serving similar grade levels	Schools serving corresponding grade levels	Schools serving corresponding grade levels, usually three groups permitted with a fourth group if there are schools serving nine or more grade levels	1. Schools serving corresponding grade levels, usually three groups permitted with a fourth group (for a K-12 district) if there are schools serving eight or more grade levels above kindergarten

Continued--

Figure 1 (continued)

Components of the Comparability Provision	Regulations and Guidelines Issued Prior to 1970	Program Guide No. 57 (February 26, 1970)	First Set of Comparability Regulations (October 14, 1971)	Second Set of Comparability Regulations (June 28, 1973)	Third Set of Comparability Regulations (September 28, 1976)
		2. SEAs may permit districts to consider differences between large and small schools			2. Economies of scale provision exempts districts from reporting if no corresponding schools of same size
5. Time	Not specified	1. Historical	1. Historical	1. Current	1. Current
		2. Average	2. Average	2. Point in time	2. Point in time
		3. School year	3. School year	3. School year	3. School year
			4. Maintenance of comparability	4. Maintenance of comparability	4. Maintenance of comparability
C. Comparison Process					
1. Comparisons	Project areas and children residing therein compared with other areas or children	1. Non-project school average vs. individual project school	1. Non-project school average vs. individual project school	1. Non-project school average vs. individual project school	1. Non-project school average vs. individual project school
		2. Same grade level	2. Same grade level	2. Same grade level	2. Same grade level
		3. Optional consideration of size	3. No mention of size	3. No mention of size	3. Compare schools of similar size

Continued--

Figure 1 (continued)

Components of the Comparability Provision	Regulations and Guidelines Issued Prior to 1970	Program Guide No. 57 (February 26, 1970)	First Set of Comparability Regulations (October 14, 1971)	Second Set of Comparability Regulations (June 28, 1973)	Third Set of Comparability Regulations (September 28, 1976)
2. Statistic	Not specified	Range	Range	Range	Range
3. Rule	Resource allocation must not penalize project area and program participants	Not specified	Same services with 5 percent variance	Same services with 5 percent variance	Same services with 5 percent variance
II. RULES ON WHICH DISTRICTS MUST FILE EXEMPTIONS					
A. Exemptions	Not specified	Districts in which all areas are project areas	1. Districts in which all areas are project areas	1. Districts in which areas are project areas	1. Districts in which all areas are project areas
			2. Districts in which only one school is within grade span receiving Title I assistance	2. Districts in which only one school is within grade span receiving Title I assistance	2. Districts in which only one school is within grade span receiving Title I assistance

Continued --

Figure 1 (continued)

Components of the Comparability Provision	Regulations and Guidelines Issued Prior to 1970	Program Guide No. 57 (February 26, 1970)	First Set of Comparability Regulations (October 14, 1971)	Second Set of Comparability Regulations (June 28, 1973)	Third Set of Comparability Regulations (September 28, 1976)
				3. Schools with enrollment of 100 or less unless schools of such size in project as well as non-project areas	3. Schools with enrollment of 100 or less unless schools of such size in project as well as non-project areas
					4. Districts receiving at least 95 percent of funds from federal sources
III. RULES ON REPORTING, MONITORING AND ENFORCING COMPARABILITY					
A. Sanctions	General sanctions applicable	Demonstrate comparability or submit a plan, otherwise disapprove application	SEA may not approve application unless comparability is demonstrated or a plan is included describing how comparability is to be achieved (July 1 is date for report)	Comparability report or revised report submitted by Dec. 1. Suspend approval and withhold funds if report shows noncompliance. If by March 31, district is still out of compliance, SEA must finally disapprove	Comparability report or revised report submitted by Dec. 1. If report shows noncompliance, suspend approval and withhold funds. If by March 31, district is still out compliance, SEA must finally disapprove. No Title I funds may be used to pay for obligations incurred during suspension period

Continued --

Figure 1 (continued)

Components of the Comparability Provision	Regulations and Guidelines Issued Prior to 1970	Program Guide No. 57 (February 26, 1970)	First Set of Comparability Regulations (October 14, 1971)	Second Set of Comparability Regulations (June 28, 1973)	Third Set of Comparability Regulations (September 28, 1976)
B. Monitoring	SEA	SEA	SEA	SEA	SEA
C. Accounting and Reporting	No specific provisions specified	1. District must report comparability	1. District must submit report demonstrating comparability	1. District must submit report demonstrating comparability	1. District must submit report demonstrating comparability
		2. District must specify standard accounting procedures used	2. SEA develops format	2. OE develops format	2. OE develops format
		3. SEA develops comparability format		3. Resource records and worksheets must be kept and made available for individual schools	3. Resource records and worksheets for individual schools retained and made available
				4. SEA must submit report on districts in national sample and districts failing to meet comparability	4. SEA must submit report on districts in national sample, districts failing to meet comparability and a report on whether noncomparable districts have come into compliance and any revised reports filed

FIGURE 2

THE COMPARABILITY PROVISION

A. CRITERIA

1. Pupils per instructional staff

2. Expenditures for instructional staff salaries, excluding longevity, per pupil

B. OPTIONS FOR INCLUDING OR EXCLUDING RESOURCES FOR SPECIAL PROGRAMS

Districts have an option to include or exclude from their comparability calculations:

- expenditures and number of staff funded by state and local compensatory education programs similar to Title I; and

- pupils participating in and the number and salaries of staff funded by handicapped and bilingual programs

C. COMPARISON PROCESS

1. Rules for grouping schools

a. by grade span -- in general, not to exceed: three such groups for a K-12 district; one group for a K-7 district; two groups if the district provides education at eight or nine grade levels above kindergarten.

b. by enrollment size -- within each grade span, two size categories can be used if the enrollment of some schools in a grade span group is at least twice as large as the enrollment of other schools in the same grade span category. In addition, districts must exclude all schools with enrollment of 100 or less from their comparability report.

Continued--

Figure 2 (continued)

2. Comparability is demonstrated if each Title I school in a district has a ratio of pupils per instructional staff which does not exceed 105 percent of the average in all similar non-Title I schools in the district and if each Title I school expends, for instructional staff salaries per pupil, not less than 95 percent of the average spent in all similar non-Title I schools in the district.

D. REPORTING REQUIREMENTS AND SANCTIONS

1. Districts must demonstrate comparability by December 1 of each year based on data collected as of a date established by the SEA (date certain), prior to November 1, and close to October 1. Data must be actual, not budgetary or estimated.

2. Districts not comparable as of date certain must reallocate staff and prepare a revised comparability report based on data collected after the reallocation of resources.

3. SEAs must suspend all Title I funding in districts not comparable by December 1 unless comparability is achieved by March 1 of the following year. If comparability is achieved prior to March 1, then funds are to be withheld only for the period during which the district was noncomparable.

E. MAINTENANCE OF COMPARABILITY

1. Districts must provide assurances and maintain records and worksheets demonstrating that comparability is being maintained throughout the school year.

FIGURE 3

The Study Mandate

STUDY OF ALTERNATIVES FOR DEMONSTRATING COMPARABILITY

Sec. 102.(a) The Commissioner shall, not later than September 30, 1981, make a study of the feasibility and desirability of alternative criteria for demonstrating the comparability of services provided with state and local funds in each project area (as defined in section 198(12) of the Elementary and Secondary Education Act of 1965) to those provided outside such areas which ensure, at least to the same extent as the criteria in existing regulations published in the Federal Register (41 F.R. 42894 et seq., September 28, 1976), that children in each school serving such a project area receive comparable services paid for out of state and local funds.

(b) The Commissioner may select all the local educational agencies in one state and not more than twenty such agencies in other states which are reasonably representative of the various geographical areas of the nation for participation in the study provided for in this section. For purposes of the study, the Commissioner, without regard to section 431 of the General Education Provisions Act, may permit the use of substitute criteria meeting the requirements of subsection (c) in place of criteria contained in existing regulations, to be applicable only for the school years 1979-80 and 1980-1981 and only to local educational agencies selected to participate in the study;

(c) Local educational agencies selected for participation in the study provided for in this section shall demonstrate comparability through the use of alternative criteria, which, at a minimum, meet the conditions of the following paragraphs:

(1) Such criteria are approved by the districtwide advisory council established under section 125 of the Elementary and Secondary Education Act of 1965.

(2) Based on such criteria, each school serving such a project area receives services comparable to those services provided with state and local funds in schools not receiving assistance under this title.

Continued--

Figure 3 (continued)

(3) Services measured by such criteria shall vary by not more than 5 percentum between each school serving such a project area and other schools of the agency.

(4) Compliance with such criteria shall be determined on the basis of services actually provided during the current school year.

(5) If expenditures are used in the criteria, only expenditures for instructional services shall be included and for this purpose "instructional services" means current expenditures for free public education other than expenditures for attendance and health services, pupil transportation services, operation and maintenance of plant, fixed charges, and net expenditures to cover deficits for food services and student body activities.

(6) In all other respects, such criteria shall be consistent with the regulations of the Commissioner pertaining to comparability of services.

(d) In order to provide a basis for comparison, local educational agencies participating in the study under this section shall continue to make reports under existing criteria for comparability of services.

FIGURE 4

ALTERNATIVES SELECTED BY STUDY DISTRICTS AND IMPLEMENTATION STATUS

Alternatives		Implementation Status			
Changes to Criteria	Other Changes	Implemented and Reported to SEA	Implemented But Not Reported to SEA	Implemented With Minor Change	Not Implemented
Staff-Based					
1. Three criteria of pupils per instructional staff -- pupils per certified classroom personnel, pupils per other certified instructional personnel and pupils per noncertified instructional personnel		1			3[a]
2. Single criterion of pupils per weighted instructional staff excluding consultants or supervisors of instruction; certified staff weighted by 1.0, noncertified staff weighted by: $\frac{\text{average salary noncertified}}{\text{average salary all staff}}$		1			
3. Single criterion of pupils per weighted instructional staff, excluding paraprofessionals[b]	Exclude non-Title I magnet schools from comparison process			1[b]	
4. Single criterion of pupils per weighted instructional staff, excluding principals, secretaries, librarians, instrumental music teachers, social work/counselors, exceptional education staff and special programs staff; teacher interns weighted by 0.5; classroom aides weighted by 0.4; all other categories weighted by 1.0		1			

Figure 4 (continued)

Alternatives		Implementation Status			
Changes to Criteria	Other Changes	Implemented and Reported to SEA	Implemented But Not Reported to SEA	Implemented With Minor Change	Not Implemented
Staff-Based (continued)					
5. Single criterion of pupils per weighted instructional staff, excluding staff members who do not work directly with students; teachers weighted by 1.0, teacher aides weighted by 0.5	Schools clustered into three groups according to grade spans K-3, 4-6 and K-6			1[c]	
6. Single criterion of weighted FTE pupils per FTE regular basic program certified classroom teachers[d]			1[d]		
7. Single criterion of pupils per assigned classroom teachers		1			
8. Single criterion of weighted instructional and support services per pupil; instructional services defined as number of minutes per day provided by teachers and teacher aides; support services defined as number of minutes per day provided by principals, vice principals, secretaries, clerks, librarians, counselors, and visiting and itinerant teachers; teachers weighted by 1.0, aides by 0.5; support personnel weighted by percent of time spent at each school	Schools grouped according to five grade spans: K-2, K-5, 6, 6-8 and 7-8	1			

Continued--

Figure 4 (continued)

Alternatives		Implementation Status			
Changes to Criteria	Other Changes	Implemented and Reported to SEA	Implemented But Not Reported to SEA	Implemented With Minor Change	Not Implemented
Staff-Based (continued)					
9a. Single criterion of pupils per weighted instructional staff, excluding principals and secretaries. FTE certified staff weighted based on 1,080 hours per year; FTE non-certified staff weighted based on 2,080 hours per year		9			2
9b. Single criterion of pupils per weighted instructional staff, excluding principals and secretaries. FTE certified staff weighted based on 1,080 hours per year, FTE non-certified staff weighted based on 2,080 hours per year	Schools may be grouped into three size groupings if the largest school in a grade span is at least three times as large as the smallest school within the same grade span			4[e]/	
Other Modifications to Criteria					
10. Single criterion of instructional staff salaries per pupil inclusive of longevity			1[f]/		
11. Single criterion of instructional staff salaries per pupil excluding payments for longevity and educational attainment; excluding exceptional education staff, bilingual education staff and psychological personnel and excluding exceptional and bilingual program participants	Schools may be grouped into three size groupings if the largest school in a grade span is two times as large as the smallest school within the same grade span				1[g]/

Continued--

Figure 4 (continued)

Alternatives		Implementation Status			
Changes to Criteria	Other Changes	Implemented and Reported to SEA	Implemented But Not Reported to SEA	Implemented With Minor Change	Not Implemented
Other Modifications to Criteria (continued)					
12. Single criterion of instructional staff salaries per pupil excluding nonassigned personnel and payments for educational attainment and longevity	Schools may be grouped into three size groupings if the largest school in a grade span is three times as large as the smallest school within the same grade span			1[h/]	
13. Two existing criteria, including payments for longevity	Use median value for non-Title I schools	1			
14. Two existing criteria, excluding payments for educational attainment and longevity and excluding staff not providing direct services to children. For purposes of counting students who attend school outside their attendance area, use the average number of students and the average number of teachers in that school	Exclude Title I eligible schools not funded from comparison process			1[i/]	
Expenditure-Based					
15. Single criterion of expenditures for instructional services per pupil		1	1[j/]		
Other					
16. No changes to criteria	Schools grouped according to four grade spans: K-3, 4-6, 7-9 and 10-12				1[k/]

NOTES

a. Two of the three districts not implementing this alternative did not understand their obligations under the waiver. The third district lost interest in participating in the study.

b. The weighting scheme used in the alternative is provided as Attachment A. The district did not exclude non-Title I magnet schools from the comparison process due to a misunderstanding.

c. This district did not weight teacher aides because they believed it was unnecessary -- the change to the grade span groupings resulted in all schools being comparable without the weighting of staff.

d. Regular basic program certified classroom teachers includes state and locally funded certified classroom teachers employed to teach in the regular basic program. Pupils includes only regular basic program participants. Regular basic program is the general instructional program operating at every school and excludes special education, education alternatives and other special programs. FTE pupils are calculated on the basis of 25 hours of program contact per week. FTE counts of pupils are weighted according to the state allocation policy for the regular basic program which weights pupils in grades K-3 as 1.234 and pupils in grades 4-9 as 1.0. FTE regular basic program certified classroom teachers are calculated on the basis of 27 1/2 hours of program contact per week. This district calculated comparability under their alternative but chose to report to the SEA under the existing provision because it required fewer resource reallocations.

e. All four districts selecting this alternative chose not to use a third size grouping because they found it to be unnecessary.

f. This district implemented their alternative but decided to report to the SEA under the existing provision because fewer reallocations were required.

g. This district did not implement their alternative because of a compliance agreement negotiated with the SEA in 1979-80, which required the district to achieve compliance under the existing provision.

h. This district did not implement the portion of their alternative allowing an additional size grouping because they found it to be unnecessary.

i. Title I eligible schools not funded could not be excluded from the comparison process because all Title I eligible schools were funded.

j. The alternative was implemented, but the district chose to report to the SEA under the existing provison because it required fewer resource reallocations.

k. The alternative was not implemented because the grade span groupings selected were incompatible with the structure of the district's schools.

FIGURE 5

District Waiver Obligations

1. Participating districts must use substitute criteria which have been approved by the districtwide advisory council established under Section 125 of Title I, 20 U.S.C. 2735.

2a. Participating school districts must demonstrate that, based on their substitute criteria, they are providing services in project areas which, taken as a whole, are at least comparable to services being provided in areas of the district which are not receiving funds under Title I.

2b. If, however, a school district fails to comply with the assurance contained in paragraph 2(a) above, it must comply with the comparability requirements contained in Section 126(e) of Title I (20 U.S.C. 2736(e)) and in 45 CFR 116a.26 of the Title I regulations, and be able to demonstrate that it made every reasonable effort to demonstrate comparability through the use of the substitute criteria.

3. Services measured by the substitute criteria shall vary by not more than 5 percentum between each school serving a project area and other schools within the participating district.

4. Compliance with the substitute criteria shall be determined on the basis of services actually provided during the current school year.

5. If expenditures are used in the substitute criteria, the requirements in Section 102(c)(5) of Public Law 95-561 shall be met.

6. In all respects other than the variation permitted by the substitute criteria, participating districts shall comply with the requirements contained in Section 126(e) of Title I and 45 CFR 116a.26.

7. Participating districts shall continue to make reports under the requirements contained in Section 126(e) of Title I and in 45 CFR 116a.26.

Continued--

Figure 5 (continued)

8. If expenditures are used in the substitute criteria the district will include in its comparability report, projected expenditure data for instructional supplies and materials. This report will contain an assurance that the actual supplies and materials provided during the school year will meet the comparability requirements under the substitute criteria proposed by the district. At the end of the school year the district will provide an additional report which will demonstrate that the services, including the actual supplies and materials provided during the school year met the comparability requirements under the substitute criteria proposed by the district.

9. If any category of staff is excluded from the current definition of instructional staff, an assurance must be provided that such staff will be provided to schools in an equitable manner.

10. If the substitute criteria include changes to the groupings of schools or grade spans, such changes cannot result in no comparisons between Title I and non-Title I schools.

FIGURE 6

IMPACT OF EXISTING COMPARABILITY PROVISION

Component	Impact on Administrative Burden[a/]	Impact on Resource Allocation[b/]
A. CRITERIA		
1. Pupils per instructional staff	Not substantially burdensome.	Where resource reallocation was reported, it usually involved less than three staff members.
2. Expenditures for instructional staff salaries, excluding longevity, per pupil	A major source of burden, particularly in large and mid-sized districts that collect instructional staff salary data manually.	Reported resource reallocation was typically very small -- less than three staff members.
B. OPTIONS FOR INCLUDING OR EXCLUDING RESOURCES FOR SPECIAL PROGRAMS	Can be burdensome in large and mid-sized districts if data on special program pupils and/or staff are not readily available at the school level.	Where resource reallocation was reported, it was relatively small. Most staffing adjustments reported were in districts that wanted to exclude additional programs (e.g., gifted and talented).
C. COMPARISON PROCESS		
1. Rules for grouping schools		
a. by grade span	Not burdensome.	Resource reallocation occurred in districts with a desegregation plan that resulted in nontraditional grade span groupings and where state or district policy provided additional resources to schools within a grade span group.
b. by enrollment size	Not burdensome.	Could reduce reallocations in districts with a wide variance of school size.
2. Each Title I school in a district compared to the average of similar non-Title I schools with 5 percent permissible variance.	Not burdensome.	Large resource reallocation was reported mostly in very large districts with a desegregation plan, declining or fluctuating enrollment.
D. REPORTING REQUIREMENTS AND SANCTIONS		
1. Districts must demonstrate comparability by December 1 of each year based on data collected as of a date established by the SEA (date certain), prior to November 1, and close to October 1.	Can be burdensome (particularly in large and mid-sized districts) if SEA selects a date before accurate staff and salary data are available; expecially for districts using computer data files.	No impact on magnitude of resource reallocation. However, many districts perceived all reallocations that did not occur at beginning of school year or at semester break as disruptive.

Continued--

Figure 6 (continued)

Component	Impact on Administrative Burden[a]	Impact on Resource Allocation[b]
2. Districts not comparable as of date certain must reallocate staff and prepare a revised comparability report based on data collected after the reallocation of resources.	Can be burdensome in large and mid-sized districts where enrollment and/or staff are fluctuating and in which data must be collected manually.	No impact on magnitude of resource reallocation.
3. SEAs must suspend all Title I funding in districts not comparable by December 1 unless comparability is achieved by March 1 of the following year. If comparability is achieved prior to March 1, then funds are to be withheld only for the period during which the district was noncomparable.	No direct impact on administrative burden; however, some districts must collect data and prepare comparability reports several times in order to achieve comparability by December 1.	No impact on magnitude of resource reallocation.
E. MAINTENANCE OF COMPARABILITY		
1. Districts must provide assurances and maintain records and worksheets demonstrating that comparability is being maintained throughout the school year.	Can be burdensome for districts which prepare periodic maintenance of comparability reports and in which pupils and/or staff transfer in or out of schools during the year.	Disruption was reported where districts monitored maintenance of comparability and reallocated resources in order to ensure that comparability was maintained. Large resource reallocation and severe disruption was reported mostly in large districts with fluctuating enrollment.

a/ Over half of the study districts spent less than 10 days on their two most burdensome comparability tasks. Severe burden was reported in only seven districts.

b/ Most districts made less than three staff adjustments to achieve comparability. The magnitude of resource reallocation was larger in only eight districts.

FIGURE 7

IMPACT OF ALTERNATIVE COMPARABILITY PROVISIONS

Component	Impact on Administrative Burden[a/]	Impact on Resource Allocation[b/]	
		District Reported Impact	Empirically Assessed Impact
I. CRITERIA			
A. Staff-Based			
1. Three criteria of pupils per instructional staff--pupils per certified classroom personnel, pupils per other certified instructional personnel, and pupils per noncertified instructional personnel.	Burden was reduced, particularly for large and mid-sized districts that compile instructional staff salary data manually.	In one district this alternative reduced the amount of resource reallocations required to comply with comparability. However, the district reported that their staffing flexibility was reduced because all schools were required to have the same mix of staff.	Insufficient data for empirical assessment.
2. Single criterion of pupils per weighted instructional staff, excluding some categories of staff.	Reduced burden, particularly for large and mid-sized districts that compile instructional staff salary data manually.	Little impact in small and mid-sized districts where resource allocation to schools was based on a per pupil and/or per building basis; reduced or eliminated small resource reallocation (less than 3 staff) in others; caused small resource reallocation in some districts.	Insufficient data for empirical assessment.
3. Single criterion of pupils per classroom teachers.	Reduced burden, particularly for large and mid-sized districts that compile instructional staff salary data manually.	Dramatically reduced resource reallocation in one district which equalized classroom teachers among schools based on a court order.	No uniform effect. Easier for some districts to achieve comparability using this criterion, but harder for others.

Continued--

Figure 7 (continued)

Component	Impact on Administrative Burden[a]	Impact on Resource Allocation[b]	
		District Reported Impact	Empirically Assessed Impact
B. Other Modifications to Criteria			
1. Inclusion of longevity in the calculation of instructional staff salaries per pupil.	Reduced burden, particularly for large and mid-sized districts where salary data is compiled by subtracting longevity payments from total salary. However, few districts do this.	Where longevity pay is unequal between Title I and non-Title I schools, inclusion of payments for longevity increases the likelihood that such districts will have to reallocate resources.	More difficult for some districts to achieve comparability when longevity payments are included. Many districts would have needed substantial reallocations of staff to achieve comparability.
2. Exclusion of payments for longevity and educational attainment and exclusion of nonassigned personnel.	Reduced burden, particularly in large and mid-sized districts where salary data is manually compiled.	Eliminates small resource reallocations needed to achieve comparability in mid-sized districts. Would probably reduce reallocations in very large or desegregated districts where Title I schools tend to receive less experienced staff.	No uniform effects found by altering the definition of staff and/or excluding payments for longevity and educational attainment.
3. Two existing criteria including only teachers and aides.	Very small reduction in burden occurs as as a result of decreased data collection based on fewer staff.	Would probably increase the need for resource reallocation in initial years as many districts do not equalize instructional aides among schools.	No uniform effect. These criteria would increase the difficulty in some districts for achieving comparability but decrease it in others.
C. Expenditure-Based			
1. Single criterion of expenditures for instructional services per pupil.	Reduces burden in districts that collect such data on a school-by-school basis; however for other districts, burden would be substantially increased.	Reduced resource reallocation in one district where instructional expenditures are equalized among schools; would have required extensive resource reallocation in another district without such a policy.	Insufficient data for empirical assessment.

Continued--

Figure 7 (continued)

Component	Impact on Administrative Burden[a]	Impact on Resource Allocation[b]	
		District Reported Impact	Empirically Assessed Impact
II. CHANGES TO COMPARISON PROCESS			
A. Groupings			
1. Additional grade span group.	No impact	Reduces need for substantial resource reallocation in districts with non-traditional grade spans due to desegregation plan and in which state or local policies place additional resources in schools within a grade span.	Not empirically assessed
2. Additional enrollment size group.	No impact	Could reduce need for resource reallocation in districts with wide variance in school size.	Not empirically assessed
B. Comparison			
1. Each Title I school to non-Title I median.	No impact	No impact	Not empirically assessed
2. Average of Title I schools to average of non-Title I schools.	No impact	Could substantially reduce need for resource reallocation in all districts.	Easier for most districts to achieve comparability. Insensitive to differences in resource distribution between Title I and non-Title I schools.
3. Each Title I school to highest ranking non-Title I school.	No impact	Could substantially increase resource reallocation, especially in large districts where the non-Title I average can mask a variation in the distribution of resources.	More difficult for all districts to achieve comparability.

Continued--

Figure 7 (continued)

Component	Impact on Administrative Burden[a/]	Impact on Resource Allocation[b/]	
		District Reported Impact	Empirically Assessed Impact
C. Permissible Variance			
1. Ten percent	No impact	Would probably reduce the need for many small resource reallocations as well as decrease large reallocations of resources.	Easier for all districts to achieve comparability regardless of criteria used. Could allow substantial differences in resource allocation.
2. Zero percent	No impact	Could substantially increase the need for resource reallocation	Harder for all districts to achieve comparability especially when comparing each Title I school to highest ranking non-Title I school.
III. REPORTING REQUIREMENTS AND SANCTIONS			
A. Date Certain			
1. Mid-summer	Could reduce burden if districts were allowed to use projected data produced for school resource allocations.	Would eliminate resource reallocation as comparability would be based on projections. This would especially reduce resource reallocations in large districts with declining or fluctuating enrollment.	Not empirically assessed
2. Early October	Burden could be increased especially in large and mid-sized districts because data are typically unavailable and must be collected manually.	Little impact on the magnitude of resource reallocation, however reallocations are less disruptive when they occur early in the school year.	Not empirically assessed
3. December or later	Burden could be reduced in large and mid-sized districts because computer data files are available in updated format.	May have little impact on the magnitude of resource reallocation; however reallocations are disruptive when they occur late in the school year.	Not empirically assessed

Continued--

Figure 7 (continued)

Component	Impact on Administrative Burden[a]	Impact on Resource Allocation[b]	
		District Reported Impact	Empirically Assessed Impact
4. Preparation of revised comparability report based on adjustments to date certain data collection.	Reduces burden in all districts as the need to collect new data (after resource reallocation) is eliminated.	Little impact on the magnitude of resource reallocation except in large districts with fluctuating enrollment where resource reallocation can be reduced by not accounting for changes in staff or student population occurring subsequent to date certain.	Not empirically assessed

a/ Over half of the study districts spent less than 10 days on their two most burdensome comparability tasks. Severe burden was reported in only seven districts.

b/ Most districts made less than three staff adjustments to achieve comparability. The magnitude of resource reallocation was larger in only eight districts.